

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

THE STATE OF LOUISIANA, By and  
through its Attorney General, Elizabeth B.  
Murrill;  
THE STATE OF KANSAS, By and through  
its Attorney General, Kris W. Kobach;  
THE STATE OF OHIO, By and through its  
Attorney General, Dave Yost; and  
THE STATE OF WEST VIRGINIA, By and  
through its Attorney General, John B.  
McCuskey

*Plaintiffs,*

vs.

UNITED STATES DEPARTMENT OF  
COMMERCE; JEREMY PELTER, in his  
official capacity As Acting Secretary of  
Commerce;  
BUREAU OF THE CENSUS, an agency  
Within the United States Department of  
Commerce; and  
ROBERT L. SANTOS, in his official  
Capacity as Director of the U.S. Census  
Bureau

*Defendants.*

Case No.: 6:25-cv-0076-DCJ-DJA

Judge David C. Joseph  
Magistrate Judge David J Ayo

DECLARATION OF CECILE SCOON

My name is Cecile Scoon. I am over the age of 18 and fully competent to make this declaration. I am submitting this declaration in support of the Motion to Intervene submitted by the League of Women Voters ("LWV"), League of Women Voters of Florida ("LWVFL"), and the League of Women Voters of New York State. Under penalty of perjury, I declare the following:

**Personal Background**

1. I am a current member and Co-President of LWVFL.
2. I reside in Panama City, Florida. I have lived there for approximately the last forty years. I have been registered to vote in Florida for approximately the last forty years. I routinely vote in Florida elections.
3. I have been a member of LWVFL for approximately 20 years. I served as President of LWVFL from 2021 to 2023 and have been the organization's Co-President since 2023. As the Co-President of LWVFL, I – along with my co-president – oversee and coordinate the activities of the League on a statewide level. I work for LWVFL as an unpaid volunteer.

**League of Women Voters of the State of Florida**

4. LWVFL is the Florida state affiliate of the League of Women Voters, a national organization founded in 1920.
5. LWVFL is a nonpartisan, nonprofit, grassroots, community-based, membership organization. LWVFL has 29 local chapters throughout the state of Florida, more than a thousand dues-paying members, and an even greater number of supporters and volunteers, all of whom receive regular communications from the LWVFL. LWVFL is powered by our members and volunteers. In total, LWVFL has only three full-time paid staff members and a part-time bookkeeper.
6. Over the decades, LWVFL has consistently stood for safeguarding and enhancing our democracy and for fair and equitable representation for the people of Florida. The LWVFL has worked toward achieving these goals through a combination of education, advocacy, mobilization and litigation.

7. For years, LWVFL has worked toward achieving a more representative democracy through efforts that have included, but are by no means limited to, campaigning and advocating for the voting rights of classes of voters traditionally discriminated against in voting; working to eliminate barriers to voting for all of the state's registered voters; participating in voter registration efforts; and participating in campaigns and advocacy geared toward achieving fairly redistricted legislative and congressional districts using a total population count.
8. LWVFL has sought to register marginalized voters and has a commitment to assisting all voters and potential voters, regardless of party, economic status, or race. For instance, the League has sought to educate and assist newly naturalized American citizens who have never participated in Florida elections and, when possible, LWVFL conducts voter registration events at naturalization ceremonies. Additionally, LWVFL also advocated for and helped secure the passage of Amendment 4 on behalf of Floridians formerly unable to vote because of criminal convictions.
9. LWVFL's efforts to maintain and strengthen representative democracy in both Florida and the country have also included working toward maintaining and improving the accuracy of the census count. LWVFL has long believed that an accurate census count ensures fair representation within the state of Florida, adequate representation in Congress, and a fair share of federal resources for the State of Florida.
10. Following the positions set by our membership, LWVFL believes that congressional districts and legislative bodies should be apportioned substantially on population. LWVFL has opposed efforts to allow apportionment to be based on factors other than population.



11. LWFL has a well-established interest in ensuring that all residents are counted in the Census to establish apportionment and provision of Federal resources to Florida and has previously engaged in efforts to prevent the first Trump Administration from excluding non-citizens from the 2020 Census. Specifically, LWVFL joined an amicus (along with LWV and two other state Leagues) in the U.S. Supreme Court in *New York v. Trump*.


**Defending an Apportionment Count Based on Total Population**

12. LWVFL and its members will be harmed if Plaintiffs prevail in their challenge to the longstanding, well-established practice of conducting an apportionment count based on total population. As studies have shown, Florida has a disproportionately high number of undocumented persons and non-immigrant visa holders, and our members together with all of Florida's voters would lose representation and a significant amount of federal funding if Plaintiffs prevail in their suit.
13. The implementation of an apportionment count based on total population is crucial to the work of LWVFL, which involves protecting and strengthening Florida's and this country's representative democracy. The courts have never held that citizenship, permanent residence, or authorized residence is a requirement for being counted in the Census. LWVFL posits that protecting our representative democracy requires ensuring that apportionment continues to be based on the total population of all residents.
14. Including immigration related questions on the Census, including a citizenship question, which is part of the remedy the Plaintiffs seek in this case, will have the effect of undermining the accuracy of the Census. This is particularly true, in states like Florida, where there are many immigrants and citizens who live with family members who are non-citizens who are understandably concerned about sharing information about their

immigration status or the immigration status of their family members, who will choose not to answer the Census to avoid revealing their immigration status or the immigration status of family members. For this reason, including immigration related questions on the Census will impede the mission of LWVFL by interfering with our ability to ensure that Florida receives correct apportionment and representation at Congress which is one of the ways that we empower Florida's voters and defend our shared democracy, a goal which can only be achieved through complete counts and equitable representation in legislative bodies.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 8, 2025

  
Cecile Scoon (Apr 8, 2025 19:04 EDT)

Cecile Scoon  
Co-President  
League of Women Voters of Florida